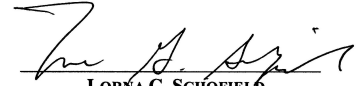


**VIA ECF**

Hon. Lorna G. Schofield  
United States District Court  
Southern District of New York  
Attn: Hon. Lorna G. Schofield, U.S.D.J.  
500 Pearl Street  
New York, NY 10007

The parties shall file a joint letter by **September 3, 2021**, specifying the names and roles of any witnesses to be deposed and the dates for the depositions of those witnesses. So ordered.

Dated: August 25, 2021  
New York, New York



LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

Re: *Edelman v. NYU Langone Health System, et al.*  
Case No. 1:21-cv-00502 (LGS) (GWG)

Dear Judge Schofield:

The parties write jointly pursuant to the Court's Order (Doc. No. 36) that the parties file a letter by August 23, 2021, specifying the names and roles of any witnesses to be deposed and the dates for the depositions of those witnesses.

The parties respectfully indicate that, other than Plaintiff, other witnesses have not yet been identified for depositions. As set forth in greater detail below, Plaintiff needs additional time to identify witnesses she seeks to depose.

The parties have diligently sought to work cooperatively and resolve any discovery disputes which has resulted in the collective exchange of a total of 1139 pages of documents. Pursuant to the Pilot Project Regarding Initial Discovery Protocols for Employment Cases Alleging Adverse Action (the "Protocols"), the parties exchanged 611 pages of documents. Due to the breadth of Plaintiff's discovery demands, Defendants produced another 528 documents<sup>1</sup> for a total of 753 pages of documents produced by Defendants with additional documents to be produced this week.

Defendants' document production contains records concerning NYU physicians (including, *inter alia*, their confidential terms of employment and compensation) who worked in the same department and location as Plaintiff when she was employed at NYU. Certain of the records have been redacted (with the exception of the physicians' names, so that Plaintiff may see for whom the records are produced) and marked "Confidential" due to their confidential nature.

Despite the parties' multiple attempts to resolve one final issue concerning their proposed Stipulated Confidentiality Order, on August 18, 2021, Defendants were constrained to file a letter motion seeking the Court's assistance to resolve the issue. Plaintiff's response to Defendants' letter is due today. Plaintiff respectfully seeks a one (1) day extension of time to respond to same. Pursuant to ¶ I(B)(2) of this Court's Individual Rules and Civil Procedures, Plaintiff submits that: (i) the original due date is August 23, 2021; (ii)-(iii) there have been no previous requests; and (iv) Defendants consent.

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<sup>1</sup> Defendants produced 373 pages of documents on August 16, 2021, and 155 pages of documents on August 20, 2021, in response to Plaintiff's discovery demands. Plaintiff did not possess any additional documents, beyond those produced pursuant to the Protocols, in response to Defendants' discovery demands.

Hon. Lorna G. Schofield  
Page 2 of 2

Once an appropriate Confidentiality Order has been entered in this action, Defendants are prepared to re-produce the confidential NYU records to Plaintiff. Thereafter, Plaintiff will ascertain who needs to be deposed, and the parties will endeavor to expediate the scheduling of depositions.

Accordingly, the parties respectfully submit that they need additional time to determine an appropriate deposition schedule, respectfully request that this Court grant Plaintiff's consent letter motion for an extension of one (1) day to respond to Defendants' letter motion, and thank this honorable Court for its time, attention, and consideration in this case.

Dated: Lake Success, New York  
August 23, 2021

Dated: New York, New York  
August 23, 2021

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